

Philips Healthcare

August 21, 2017

The Honorable Ajit Pai, Chairman
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Subject: WT Docket No. 16-290, TerreStar Request for Temporary Waiver

Dear Mr. Chairman:

Philips Healthcare (“Philips”) wishes to reiterate its strong support for TerreStar’s request for a Temporary Waiver in the above-captioned proceeding.¹ Granting the requested waiver would enable bringing critically-needed healthcare benefits to patients and resolve unique issues with other uses of neighboring spectrum that threaten to cause destructive interference to tens of thousands of Wireless Medical Telemetry Service (WMTS) devices already operating at 1.4 GHz in hospitals.

Philips is a leading supplier of wireless medical monitoring devices to hospitals in the United States that operate in the small slice of 1.4 GHz spectrum reserved by the Commission for such wireless monitoring systems. Several years ago we became aware of TerreStar’s plan to deploy WiMAX Smart Grid systems on adjacent spectrum. After study, it was clear that such systems would present a significant danger of interference to already-deployed WMTS systems throughout the country because of the very low power and high sensitivity required of WMTS patient-worn devices.

We appreciate that upon learning of the likelihood for interference, and after its own study, TerreStar worked with the WMTS community to protect WMTS hospital systems and devices from interference that otherwise could have been destructive. TerreStar has worked with Philips and other WMTS providers to develop a long-term plan that would prevent interference to patient devices and permit expansion of much-needed WMTS capacity and capabilities.

¹ TerreStar, Request for Temporary Waiver of Substantial Service Requirements, WT Docket No. 16-290 (dated Aug. 15, 2016); Public Notice, DA 16-1029 (WTB, rel. Sept. 14, 2016).

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Earlier we expressed our strong support for Commission grant of this waiver.² We know that grant of this waiver will bring benefits to medical patients that otherwise are not obtainable. Philips is committed to working with TerreStar and other WMTS parties to achieve the improved patient care and outcomes that will be made possible by extending wireless medical telemetry to this commercial spectrum. The expanded spectrum will promote new development and innovations in telemetry healthcare applications that will benefit patients and, more generally, the entire U.S. healthcare system. The benefits from employing the spectrum as proposed by TerreStar will begin to be realized within a short time after grant of the temporary waiver.

Accordingly, we urge the Commission to grant TerreStar's Request for Temporary Waiver at its earliest opportunity so that the public can begin realizing the benefits that will be enabled by this spectrum. We would be pleased to discuss with you or your staff any aspect of this proceeding and Philips' vision for using this spectrum to improve patient care.

Respectfully submitted,



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² See Philips Healthcare, Letter dated October 4, 2016, filed in Docket 16-290; Philips Healthcare, Reply Comments dated October 14, 2016, also filed in Docket 16-290.